

Remarks

This application has been carefully reviewed in light of the Office Action mailed July 18, 2007. At the time of the Office Action, claims 1-24 were pending in this application. Of these claims, claims 1-24 have been rejected. Applicants amended claims 6, 14 and 18 for clarification purposes. No new matter was added. Applicants do not admit that these added claims were necessary as a result of any cited art. Applicants respectfully request reconsideration of the above application in view of the following remarks.

Rejection Of Claims 1-24 Under 35 U.S.C. § 103(a) As Being Unpatentable Over *Anderson et al.*, In View of *Francisco et al.* And In Further View Of *Jensen et al.*

Claims 1-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Pat. No. 7,010,507 (*Anderson et al.*), in view of U.S. Pat. No. 5,799,283 (*Francisco et al.*) and in view further view of U.S. Pat. No. 6,438,528 (*Jensen et al.*). Applicants respectfully request reconsideration and withdrawal of this rejection because the proposed combination of *Anderson et al.*, in view of *Francisco et al.* and in further view of *Jensen et al.*, fails to teach, suggest or disclose features of pending claims 1-24. Applicants further traverse on the grounds that the cited references are not properly combined.

For instance, the proposed combination of *Anderson et al.*, *Francisco et al.* and *Jensen et al.* fail to teach, suggest, or disclose claim 1, which recites, *inter alia*, “receiving transaction information from a plurality of computerized invoice systems[.]” In particular, the proposed combination of *Anderson et al.* to *Francisco et al.* would render *Anderson et al.* inoperable for its intended purpose.

The Examiner notes that *Anderson et al.* “does not explicitly disclose receiving transaction information from a plurality of computerized invoice systems,” and relies on *Francisco et al.* to demonstrate that the proposed combination of *Anderson et al.* and *Francisco et al.* teaches, suggests or discloses the presently claimed receiving transaction information from a plurality of computerized invoice systems (see Office Action mailed 7/18/2007, p. 3,

§ 3, first full paragraph). The Examiner further notes that it would have been obvious to one of ordinary art at the time the invention was made to modify *Anderson* to include *Francisco*'s computerized invoice systems (see Office Action mailed 7/18/2007, p. 3, § 3, second full paragraph). Applicants respectfully traverse such an assertion.

Assuming, *arguendo*, that a computer and memory of *Francisco et al.* which receives retailer transaction and sales tax information (see *Francisco et al.*, see Abstract, ll. 12-16) is the presently claimed receiving transaction information from a plurality of computerized invoice systems (a point in which Applicants do not agree with), the proposed modification of adding the computer and memory of *Francisco et al.* which receives the retailer transaction and sales tax information to an electronic data processing system of *Anderson et al.* would render the electronic data processing system of *Anderson et al.* inoperable for its intended purpose.

For example, *Francisco et al.* discloses a tax collection system, while *Anderson et al.* discloses a tax refund system. *Francisco et al.* requires that the stored retailer's sales tax information is used by the government to **collect** taxes from the retailer for sales made to a consumer (see Abstract, ll. 12-18, emphasis added). In contrast, the electronic data processing system of *Anderson et al.* necessitates the taxing authority or government to issue a **refund** to the tax filer so that a credit card limit of a credit card that belongs to the tax filer is increased based on the refunded amount (col. 2, ll. 34-37). The collection of sales taxes by the government from the retailers as required by *Francisco et al.* prevents the tax filer of *Anderson et al.* from obtaining a refund. At no point is the retailer of *Francisco et al.* receiving a refund on the sales tax. "[R]etailers are collection agents for the government [to] hold, and use for extended periods of time **collected tax money which belongs to the government.**" (col. 1, ll. 65 to col. 2, ll. 1, emphasis added). Since the tax filer of *Anderson et al.* cannot expect a refund if modified by the computer and memory of *Francisco et al.*, which receives retailer transaction and sales tax information thereon, it follows that the tax filer of *Anderson et al.* cannot apply the refund to the tax filer's credit card to increase the credit

card limit. Such conditions would render the electronic data processing system of *Anderson et al.* inoperable for its intended purpose.

Jensen et al. fails to cure the defective teachings of *Anderson et al.* and *Francisco et al.* Specifically, *Jensen et al.* fails to teach, disclose or suggest the presently claimed plurality of computerized invoice systems. For at least these reasons, claim 1 is patentable in light of the proposed combination of *Anderson et al.*, *Francisco et al.* *Jensen et al.* and the other references of record. Further, claims 2- 8, and 21-22, depending from claim 1, are patentable for the above stated reasons as well as their own limitations.

Further, claim 7 is believed allowable as no analysis was provided in the Office Action as to how the proposed combination of *Anderson et.*, *Francisco et al.* and *Jensen* teach, disclose, or suggest the limitations of claim 7. Specifically, the proposed combination of *Anderson et.*, *Francisco et al.* and *Jensen* fail to teach disclose, or suggest that the transaction information includes shipping information. If the Examiner deems that a subsequent Office Action is necessary, Applicant respectfully requests that such Office Action be non-final.

The proposed combination of *Anderson et al.*, *Francisco et al.* and *Jensen et al.* fail to teach, suggest, or disclose claim 9, which recites, *inter alia*, “receive transaction information from a plurality of computerized invoice systems[.]” In particular, the proposed combination of *Anderson et al.* to *Francisco et al.* would render *Anderson et al.* inoperable for its intended purpose.

The Examiner notes that *Anderson et al.* “does not explicitly disclose receiving transaction information from a plurality of computerized invoice systems [.]”, and relies on *Francisco et al.* to demonstrate that the proposed combination of *Anderson et al.* and *Francisco et al.* teaches, suggests or discloses the presently claimed receiving transaction information from a plurality of computerized invoice systems (see Office Action mailed 7/18/2007, p. 3, § 3, first full paragraph). The Examiner further notes that it would have been obvious to one of ordinary art at the time the invention was made to modify *Anderson.* to include *Francisco’s*

computerized invoice systems (see Office Action mailed 7/18/2007, p. 3, § 3, second full paragraph). Applicants respectfully traverse such an assertion.

Assuming, *arguendo*, that a computer and memory of *Francisco et al.* which receives retailer transaction and sales tax information (see *Francisco et al.*, see Abstract, ll. 12-16) is the presently claimed receiving transaction information from a plurality of computerized invoice systems (a point in which Applicants do not agree with), the proposed modification of adding the computer and memory of *Francisco et al.* which receives the retailer transaction and sales tax information to an electronic data processing system of *Anderson et al.* would render the electronic data processing system of *Anderson et al.* inoperable for its intended purpose.

For example, *Francisco et al.* discloses a tax collection system, while *Anderson et al.* discloses a tax refund system. *Francisco et al.* requires that the stored retailer's sales tax information is used by the government to **collect** taxes from the retailer for sales made to a consumer (see Abstract, ll. 12-18, emphasis added). In contrast, the electronic data processing system of *Anderson et al.* necessitates the taxing authority or government to issue a **refund** to the tax filer so that a credit card limit of a credit card that belongs to the tax filer is increased based on the refunded amount (col. 2, ll. 34-37). The collection of sales taxes by the government from the retailers as required by *Francisco et al.* prevents the tax filer of *Anderson et al.* from obtaining a refund. At no point is the retailer of *Francisco et al.* receiving a refund on the sales tax. "[R]etailers are collection agents for the government [to] hold, and use for extended periods of time **collected tax money which belongs to the government.**" (col. 1, ll. 65 to col. 2, ll. 1, emphasis added). Since the tax filer of *Anderson et al.* cannot expect a refund if modified by the computer and memory of *Francisco et al.*, which receives retailer transaction and sales tax information thereon, it follows that the tax filer of *Anderson et al.* cannot apply the refund to the tax filer's credit card to increase the credit card limit. Such conditions would render the electronic data processing system of *Anderson et al.* inoperable for its intended purpose.

Jensen et al. fails to cure the defective teachings of *Anderson et al.* and *Francisco et al.* Specifically, *Jensen et al.* fails to teach, disclose or suggest the presently claimed plurality of computerized invoice systems. For at least these reasons, claim 9 is patentable in light of the proposed combination of *Anderson et al.*, *Francisco et al.* *Jensen et al.* and the other references of record. Further, claims 10-16, depending from claim 9, are patentable for the above stated reasons as well as their own limitations.

The proposed combination of *Anderson et al.*, *Francisco et al.* and *Jensen et al.* fail to teach, suggest, or disclose claim 17, which recites, *inter alia*, “receiving transaction information from a plurality of computerized invoice systems[.]” In particular, the proposed combination of *Anderson et al.* to *Francisco et al.* would render *Anderson et al.* inoperable for its intended purpose.

The Examiner notes that *Anderson et al.* “does not explicitly disclose receiving transaction information from a plurality of computerized invoice systems [.]”, and relies on *Francisco et al.* to demonstrate that the proposed combination of *Anderson et al.* and *Francisco et al.* teaches, suggests or discloses the presently claimed receiving transaction information from a plurality of computerized invoice systems (see Office Action mailed 7/18/2007, p. 3, § 3, first full paragraph). The Examiner further notes that it would have been obvious to one of ordinary art at the time the invention was made to modify *Anderson* to include *Francisco*’s computerized invoice systems (see Office Action mailed 7/18/2007, p. 3, § 3, second full paragraph). Applicants respectfully traverse such an assertion.

Assuming, *arguendo*, that a computer and memory of *Francisco et al.* which receives retailer transaction and sales tax information (see *Francisco et al.*, see Abstract, ll. 12-16) is the presently claimed receiving transaction information from a plurality of computerized invoice systems (a point in which Applicants do not agree with), the proposed modification of adding the computer and memory of *Francisco et al.* which receives the retailer transaction and sales tax information to an electronic data processing system of *Anderson et*

al. would render the electronic data processing system of *Anderson et al.* inoperable for its intended purpose.

For example, *Francisco et al.* discloses a tax collection system, while *Anderson et al.* discloses a tax refund system. *Francisco et al.* requires that the stored retailer's sales tax information stored on the computer and memory is used by the government to **collect** taxes from the retailer for sales made to a consumer (see Abstract, ll. 12-18, emphasis added). In contrast, the electronic data processing system of *Anderson et al.* necessitates the taxing authority or government to issue a **refund** to the tax filer so that a credit card limit of a credit card that belongs to the tax filer is increased based on the refunded amount (col. 2, ll. 34-37). The collection of sales taxes by the government from the retailers as required by *Francisco et al.* prevents the tax filer of *Anderson et al.* from obtaining a refund. At no point is the retailer of *Francisco et al.* receiving a refund on the sales tax. "[R]etailers are collection agents for the government [to] hold, and use for extended periods of time **collected tax money which belongs to the government.**" (col. 1, ll. 65 to col. 2, ll. 1, emphasis added). Since the tax filer of *Anderson et al.* cannot expect a refund if modified by the computer and memory of *Francisco et al.*, which receives retailer transaction and sales tax information thereon, it follows that the tax filer of *Anderson et al.* cannot apply the refund to the tax filer's credit card to increase the credit card limit. Such conditions would render the electronic data processing system of *Anderson et al.* inoperable for its intended purpose.

Jensen et al. fails to cure the defective teachings of *Anderson et al.* and *Francisco et al.* Specifically, *Jensen et al.* fails to teach, disclose or suggest the presently claimed plurality of computerized invoice systems. For at least these reasons, claim 1 is patentable in light of the proposed combination of *Anderson et al.*, *Francisco et al.* *Jensen et al.* and the other references of record. Further, claims 18-20, depending from claim 17, are patentable for the above stated reasons as well as their own limitations.

The proposed combination of *Anderson et al.*, *Francisco et al.* and *Jensen et al.* fail to teach, suggest, or disclose claim 24, which recites, *inter alia*, "transmitting the

transaction information from a plurality of computerized invoice systems[.]” In particular, the proposed combination of *Anderson et al.* to *Francisco et al.* would render *Anderson et al.* inoperable for its intended purpose.

The Examiner notes that *Anderson et al.* “does not explicitly disclose receiving transaction information from a plurality of computerized invoice systems [.]”, and relies on *Francisco et al.* to demonstrate that the proposed combination of *Anderson et al.* and *Francisco et al.* teaches, suggests or discloses the presently claimed receiving transaction information from a plurality of computerized invoice systems (see Office Action mailed 7/18/2007, p. 3, § 3, first full paragraph). The Examiner further notes that it would have been obvious to one of ordinary art at the time the invention was made to modify *Anderson* to include *Francisco’s* computerized invoice systems (see Office Action mailed 7/18/2007, p. 3, § 3, second full paragraph). Applicants respectfully traverse such an assertion.

Assuming, *arguendo*, that a computer and memory of *Francisco et al.* which receives retailer transaction and sales tax information (see *Francisco et al.*, see Abstract, ll. 12-16) is the presently claimed receiving transaction information from a plurality of computerized invoice systems (a point in which Applicants do not agree with), the proposed modification of adding the computer and memory of *Francisco et al.* which receives the retailer transaction and sales tax information to an electronic data processing system of *Anderson et al.* would render the electronic data processing system of *Anderson et al.* inoperable for its intended purpose.

For example, *Francisco et al.* discloses a tax collection system, while *Anderson et al.* discloses a tax refund system. *Francisco et al.* requires that the retailer’s sales tax information stored on the computer and memory is used by the government to **collect** taxes from the retailer for sales made to a consumer (see Abstract, ll. 12-18, emphasis added). In contrast, the electronic data processing system of *Anderson et al.* necessitates the taxing authority or government to issue a **refund** to the tax filer so that a credit card limit of a credit card that belongs to the tax filer is increased based on the refunded amount (col. 2, ll. 34-37).

The collection of sales taxes by the government from the retailers as required by *Francisco et al.* prevents the tax filer of *Anderson et al.* from obtaining a refund. At no point is the retailer of *Francisco et al.* receiving a refund on the sales tax. “[R]etailers are collection agents for the government [to] hold, and use for extended periods of time **collected tax money which belongs to the government.**” (col. 1, ll. 65 to col. 2, ll. 1, emphasis added). Since the tax filer of *Anderson et al.* cannot expect a refund if modified by the computer and memory of *Francisco et al.*, which receives retailer transaction and sales tax information thereon, it follows that the tax filer of *Anderson et al.* cannot apply the refund to the tax filer’s credit card to increase the credit card limit. Such conditions would render the electronic data processing system of *Anderson et al.* inoperable for its intended purpose.

Jensen et al. fails to cure the defective teachings of *Anderson et al.* and *Francisco et al.* Specifically, *Jensen et al.* fails to teach, disclose or suggest the presently claimed plurality of computerized invoice systems. For at least these reasons, claim 1 is patentable in light of the proposed combination of *Anderson et al.*, *Francisco et al.*, *Jensen et al.* and the other references of record.

Conclusion

For the foregoing reasons, Applicants believe that the Office Action of July 18, 2007 has been fully responded to. Consequently, in view of the above amendments and remarks, Applicants respectfully submit that the application is in condition for allowance, which allowance is respectfully requested.

Please charge any fees or credit any overpayments as a result of the filing of this paper to the deposit account of Ford Global Technologies, LLC, Account No. 06-1510.

If the Examiner feels that a telephonic conference would advance prosecution of this application in any manner, the Examiner is invited to contact Martin J. Sultana, Representative for Applicants, at the Examiner's convenience at (248) 358-4400.

Respectfully submitted,

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Date: October 17, 2007

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